

# EXHIBIT B

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December 17, 2024

**VIA EMAIL**

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**Re: MDL 3084 – Plaintiffs’ Compliance with Pretrial Order No. 10**

Counsel,

We write to discuss Plaintiffs’ obligations under Pretrial Order No. 10 (“PTO 10”). PTO 10 requires each Plaintiff who joined the MDL on or before March 26, 2024 to submit a complete PFS via MDL Centrality by no later than May 25, 2024—i.e., within 60 days after March 26, 2024. PTO 10 at 5. PTO 10 requires each Plaintiff who joins the MDL after March 26, 2024 to submit the complete PFS within 30 days after filing. *Id.* at 6. On November 8, 2024, the Court adopted the stipulation entered between Levin Simes and Uber, extending the PFS deadlines for certain Plaintiffs represented by Levin Simes. Pursuant to the parties’ stipulation and the Court’s Order, a “Plaintiff Fact Sheet for any Plaintiff represented by Levin Simes LLP who joined the MDL by September 2, 2024 and submitted a bona fide ride receipt” was due on December 16, 2024. Dkt. No. 1856 at 7.

The following Levin Simes Plaintiffs joined the MDL by September 2, 2024 and purported to submit a bona fide ride receipt but did not provide the required PFS by December 16, 2024:

1. LSA 340, No. 3:23-cv-01165, MDLC ID 1112
2. LS 90, No. 3:23-cv-03956, MDLC ID 1114

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2

3. LS 16, No. 3:23-cv-03758, MDLC ID 1117
4. LS 154, No. 3:23-cv-03807, MDLC ID 1118
5. LS 250, No. 3:23-cv-03995, MDLC ID 1122
6. LS 320, No. 3:23-cv-04010, MDLC ID 1125
7. LS 354, No. 3:23-cv-04387, MDLC ID 1133
8. LS 164, No. 3:23-cv-04373, MDLC ID 1135
9. LS 376, No. 3:23-cv-05183, MDLC ID 1144
10. LS 383, No. 3:23-cv-05197, MDLC ID 1148
11. LS 177, No. 3:23-cv-05219, MDLC ID 1149
12. LS 107, No. 3:23-cv-05232, MDLC ID 1151
13. LS 384, No. 3:23-cv-05292, MDLC ID 1158
14. LS 174, No. 3:23-cv-05359, MDLC ID 1165
15. LS 97, No. 3:23-cv-05368, MDLC ID 1168
16. LS 244, No. 3:23-cv-05372, MDLC ID 1171
17. LS 353, No. 3:23-cv-05401, MDLC ID 1174
18. LS 98, No. 3:23-cv-05412, MDLC ID 1179
19. LS 326, No. 3:23-cv-05415, MDLC ID 1180
20. LS 266, No. 3:23-cv-05416, MDLC ID 1181
21. LS 33, No. 3:23-cv-05427, MDLC ID 1183
22. LS 59, No. 3:23-cv-05575, MDLC ID 1188
23. LS 387, No. 3:23-cv-05934, MDLC ID 1193
24. LS 333, No. 3:23-cv-05930, MDLC ID 1194
25. LS 285, No. 3:23-cv-05919, MDLC ID 1196
26. LS 245, No. 3:23-cv-05944, MDLC ID 1199
27. LS 381, No. 3:23-cv-05942, MDLC ID 1201
28. LS 527, No. 3:24-cv-05414, MDLC ID 2278
29. LS 510, No. 3:24-cv-05145, MDLC ID 2281
30. LS 176, No. 3:24-cv-05903, MDLC ID 2282
31. LS 252, No. 3:24-cv-05334, MDLC ID 2283
32. LS 330, No. 3:24-cv-05160, MDLC ID 2284
33. LS 469, No. 3:24-cv-05874, MDLC ID 2286
34. LS 502, No. 3:24-cv-05548, MDLC ID 2287
35. LS 429, No. 3:24-cv-05797, MDLC ID 2289
36. LS 482, No. 3:24-cv-05593, MDLC ID 2291
37. LS 156, No. 3:24-cv-05917, MDLC ID 2294
38. LS 160, No. 3:24-cv-05996, MDLC ID 2295
39. LS 169, No. 3:24-cv-05918, MDLC ID 2296
40. LS 506, No. 3:24-cv-05531, MDLC ID 2298
41. LS 467, No. 3:24-cv-05652, MDLC ID 2299
42. LS 268, No. 3:24-cv-05910, MDLC ID 2305
43. LS 300, No. 3:24-cv-05900, MDLC ID 2308
44. LS 419, No. 3:24-cv-05263, MDLC ID 2310
45. LS 351, No. 3:24-cv-05884, MDLC ID 2312
46. LS 507, No. 3:24-cv-05509, MDLC ID 2313

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3

47. LS 352, No. 3:24-cv-05880, MDLC ID 2316
48. LS 492, No. 3:24-cv-05324, MDLC ID 2319
49. LS 205, No. 3:24-cv-05896, MDLC ID 2320
50. LS 378, No. 3:24-cv-05875, MDLC ID 2323
51. LS 519, No. 3:24-cv-05759, MDLC ID 2329
52. LS 449, No. 3:24-cv-05689, MDLC ID 2334
53. LS 509, No. 3:24-cv-05662, MDLC ID 2341
54. LS 451, No. 3:24-cv-05757, MDLC ID 2342
55. LS 114, No. 3:24-cv-05919, MDLC ID 2343
56. LS 161, No. 3:24-cv-05912, MDLC ID 2347
57. LS 480, No. 3:24-cv-05549, MDLC ID 2348
58. LS 355, No. 3:24-cv-05887, MDLC ID 2352
59. LS 99, No. 3:24-cv-05943, MDLC ID 2353
60. LS 483, No. 3:24-cv-05550, MDLC ID 2357
61. LS 179, No. 3:24-cv-05904, MDLC ID 2358
62. LS 505, No. 3:24-cv-05533, MDLC ID 2359
63. LS 445, No. 3:24-cv-05707, MDLC ID 2360
64. LS 431, No. 3:24-cv-05808, MDLC ID 2361
65. LS 45, No. 3:24-cv-05935, MDLC ID 2362
66. LS 457, No. 3:24-cv-05817, MDLC ID 2369
67. LS 468, No. 3:24-cv-05685, MDLC ID 2370
68. LS 434, No. 3:24-cv-05814, MDLC ID 2375
69. LS 360, No. 3:24-cv-05881, MDLC ID 2376
70. LS 412, No. 3:24-cv-05317, MDLC ID 2382
71. LS 444, No. 3:24-cv-05687, MDLC ID 2384
72. LS 473, No. 3:24-cv-05544, MDLC ID 2386
73. LS 306, No. 3:24-cv-06023, MDLC ID 2388
74. LS 47, No. 3:24-cv-05571, MDLC ID 2390
75. LS 350, No. 3:24-cv-05882, MDLC ID 2392
76. LS 395, No. 3:24-cv-05867, MDLC ID 2393
77. LS 393, No. 3:24-cv-05860, MDLC ID 2396
78. LS 410, No. 3:24-cv-05873, MDLC ID 2397
79. LS 338, No. 3:24-cv-05326, MDLC ID 2400
80. LS 208, No. 3:24-cv-06024, MDLC ID 2401
81. LS 233, No. 3:24-cv-06030, MDLC ID 2403
82. LS 508, No. 3:24-cv-05425, MDLC ID 2405
83. LS 315, No. 3:24-cv-05632, MDLC ID 2407
84. LS 207, No. 3:24-cv-05965, MDLC ID 2408
85. LS 5, No. 3:24-cv-05976, MDLC ID 2409
86. LS 337, No. 3:24-cv-05892, MDLC ID 2411
87. LS 4, No. 3:24-cv-05931, MDLC ID 2412
88. LS 243, No. 3:24-cv-05939, MDLC ID 2413
89. LS 422, No. 3:24-cv-05758, MDLC ID 2414
90. LS 476, No. 3:24-cv-05646, MDLC ID 2416

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4

91. LS 435, No. 3:24-cv-05755, MDLC ID 2419
92. LS 452, No. 3:24-cv-05756, MDLC ID 2424
93. LS 89, No. 3:24-cv-05924, MDLC ID 2435
94. LS 151, No. 3:24-cv-05927, MDLC ID 2436
95. LS 267, No. 3:24-cv-05901, MDLC ID 2437
96. LS 380, No. 3:24-cv-05879, MDLC ID 2438
97. LS 172, No. 3:24-cv-05911, MDLC ID 2441
98. LS 455, No. 3:24-cv-05812, MDLC ID 2442
99. LS 286, No. 3:24-cv-05905, MDLC ID 2444
100. LS 271, No. 3:24-cv-05906, MDLC ID 2447
101. LS 289, No. 3:24-cv-05883, MDLC ID 2454
102. LS 357, No. 3:24-cv-05643, MDLC ID 2456
103. LS 327, No. 3:24-cv-06032, MDLC ID 2457
104. LS 417, No. 3:24-cv-05821, MDLC ID 2458
105. LS 109, No. 3:24-cv-05938, MDLC ID 2463
106. LS 463, No. 3:24-cv-05653, MDLC ID 2465
107. LS 124, No. 3:24-cv-05930, MDLC ID 2467
108. LS 500, No. 3:24-cv-05513, MDLC ID 2469
109. LS 405, No. 3:24-cv-05859, MDLC ID 2475
110. LS 187, No. 3:24-cv-05432, MDLC ID 2476
111. LS 456, No. 3:24-cv-05654, MDLC ID 2477
112. LS 258, No. 3:24-cv-05984, MDLC ID 2484
113. LS 497, No. 3:24-cv-05523, MDLC ID 2486
114. LS 465, No. 3:24-cv-05876, MDLC ID 2488
115. LS 363, No. 3:24-cv-05891, MDLC ID 2495
116. LS 458, No. 3:24-cv-05679, MDLC ID 2496
117. LS 173, No. 3:24-cv-05907, MDLC ID 2497
118. LS 443, No. 3:24-cv-05663, MDLC ID 2498
119. LS 307, No. 3:24-cv-05569, MDLC ID 2500
120. LS 64, No. 3:24-cv-05375, MDLC ID 2506
121. LS 486, No. 3:24-cv-05551, MDLC ID 2507
122. LS 523, No. 3:24-cv-05155, MDLC ID 2508
123. LS 106, No. 3:24-cv-05945, MDLC ID 2510
124. LS 281, No. 3:24-cv-05430, MDLC ID 2511
125. LS 324, No. 3:24-cv-05920, MDLC ID 2516
126. LS 132, No. 3:24-cv-05934, MDLC ID 2517
127. LS 295, No. 3:24-cv-06025, MDLC ID 2521
128. LS 137, No. 3:24-cv-05921, MDLC ID 2522
129. LS 192, No. 3:24-cv-05975, MDLC ID 2524
130. LS 86, No. 3:24-cv-05970, MDLC ID 2525
131. LS 225, No. 3:24-cv-05336, MDLC ID 2528
132. LS 131, No. 3:24-cv-05337, MDLC ID 2530
133. LS 343, No. 3:24-cv-05793, MDLC ID 2531
134. LS 128, No. 3:24-cv-05377, MDLC ID 2534

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5

- 135. LS 528, No. 3:24-cv-05397, MDLC ID 2535
- 136. LS 101, No. 3:24-cv-05521, MDLC ID 2539
- 137. LS 466, No. 3:24-cv-05650, MDLC ID 2540
- 138. LS 471, No. 3:24-cv-05630, MDLC ID 2541
- 139. LS 366, No. 3:24-cv-05886, MDLC ID 2547
- 140. LS 288, No. 3:24-cv-05987, MDLC ID 2550
- 141. LS 475, No. 3:24-cv-05642, MDLC ID 2552
- 142. LS 454, No. 3:24-cv-05695, MDLC ID 2553
- 143. LS 409, No. 3:24-cv-05820, MDLC ID 2555

In addition, the following Levin Simes Plaintiffs joined the MDL after September 2, 2024 but have not provided the required PFS within 30 days of filing their complaints:<sup>1</sup>

- 1. LS 536, No. 3:24-cv-07659, MDLC ID 2650<sup>2</sup>
- 2. LS 525, No. 3:24-cv-07501, MDLC ID 2717<sup>3</sup>

In each of the cases above, please provide the overdue PFS by no later than January 3, 2025. Uber reserves all rights with respect to any Plaintiff who does not provide the overdue PFS within this timeframe, including the right to move for dismissal with prejudice.

Sincerely,

**PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP**

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<sup>1</sup> This list does not include Plaintiffs LS 530, No. 3:24-cv-07143, MDLC ID 2623; LS 532, No. 3:24-cv-06927, MDLC ID 2651; or LS 534, No. 3:24-cv-07142, MDLC ID 2653. Those Plaintiffs were discussed in our November 20, 2024 letter.

<sup>2</sup> Complaint filed on November 4, 2024.

<sup>3</sup> Complaint filed on October 29, 2024.